

### REMARKS

Claims 1 and 5-7 stand rejected under 35 USC 102(e) as being anticipated by WIPO Publication No. 2004/103747 to Ericson. Claims 1 and 5-7 stand rejected under 35 USC 102(b) as being anticipated by U.S. Patent No. 6,616,800 to Ericksson. Claims 2-4 stand rejected under 35 USC 103(a) as being obvious over WIPO Publication No. 2004/103747 to Ericson (or U.S. Patent No. 6,616,800 to Ericksson) in view of WIPO Publication No. 1986/07017 to Bergman. Claim 34 stands rejected under 35 USC 103(a) as being obvious over WIPO Publication No. 2004/103747 to Ericson in view of WIPO Publication No. 2004/014687 to Jensen. Claim 38 stands rejected under 35 USC 103(a) as being obvious over WIPO Publication No. 2004/103747 to Ericson in view of WIPO Publication No. 1986/07017 to Bergman. Applicant has amended the claims to more particularly define the present invention over the cited prior art.

More specifically, claim 1 has been amended to require that the mounting means, first and second winder spools and first and second wire wrap around guide element are all mounted on a unitary support member with the first and second wire wrap around guide elements spaced from the first and second winder spools and the mounting means. In this manner, Applicant has clarified that the invention relates to a single unit which carries this arrangement of components. These features are not taught or suggested in the cited prior art.

The arrangement of WO2004/103747 employs wire guide elements 11,12 that are co-located with respective suction mounts 7,8 and thus does not employ "first and second wire wrap around guide elements spaced from ...the mounting means "as required by amended claim 1.

The arrangement of US Patent No. 6,616,699 employs wire guide elements 29,31 that are co-located with respective suction mounts 14,16 and thus does not employ "first and second wire wrap around guide elements spaced from ...the mounting means "as required by amended claim 1.

The arrangement of WO86/07017 has the pulley 8 on a separate device that is not part of the winder unit.

The other cited prior art does not remedy the shortcomings of WO2004/103747, US Patent No. 6,616,699, and WO86/07017.

Moreover, any combination of the pulley of WO86/07017 into the arrangement of WO2004/103747 or US Patent No. 6,616,699 would necessarily be accomplished by replacing the wire guide groove 11, 12 (or 29/31) around the respective suction members 7,8 (or 14,16) with a pulley. It is not clear how this could be achieved technically and the combination is therefore not believed to be obvious. Such an arrangement would in any event not meet the claimed feature that the wrap around the first and second wire guide elements be spaced away from both the winder spools and the mounting means (i.e. the suction member).

Thus, there are significant differences between the cited prior art and the particular arrangement of amended claim 1. Accordingly, amended claims 1 is clearly patentable over the cited prior art.

The dependent claims are patentable over the cited prior art for those reasons advanced above with respect to claim 1 from which they respectively depend and for reciting additional features that are not taught or suggested by the cited prior art.

In light of all of the above, it is submitted that the claims are in order for examination, and prompt examination is earnestly requested. Should any issues remain outstanding, the Examiner is invited to call the undersigned attorney of record so that the case may proceed expeditiously to allowance.

Respectfully submitted,

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